

# **Exhibit 10**

CONFIDENTIAL  
Michael Ben-Jacob – October 11, 2021

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
MASTER DOCKET 18-MD-2865 (LAK)  
CASE NO. 18-CV-09797

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IN RE: )  
\_\_\_\_\_)  
CUSTOMS AND TAX ADMINISTRATION OF )  
THE KINGDOM OF DENMARK )  
(SKATTEFORVALTNINGEN) TAX REFUND )  
SCHEME LITIGATION )  
\_\_\_\_\_)

C O N F I D E N T I A L

REMOTE VTC VIDEOTAPED DEPOSITION UNDER ORAL  
EXAMINATION OF  
MICHAEL BEN-JACOB  
DATE: October 11, 2021

REPORTED BY: MICHAEL FRIEDMAN, CCR

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1 involving the purchase and sale of foreign  
2 securities."

3 Do you see that?

4 A I do.

5 Q Do you recall that Mr. Woodard  
6 expressed concerns into your former clients  
7 about engaging in transactions involving the  
8 purchase of Danish shares?

9 MR. DEWEY: Objection.

10 A I am aware that Mr. Woodard had  
11 conversations with the client group in which  
12 I did not participate. I don't know what  
13 concerns he may or may not have raised in  
14 those conversations.

15 Q At the end -- if you turn to the  
16 second page of the document, the last  
17 sentence says, "Finally, we expressed some  
18 concern that if the plan is one in which an  
19 employee or partner is a fiduciary, there may  
20 be concerns under Section 4975(C)(1)(D), (E) or  
21 (F) of the code."

22 Do you see that?

23 A I do.

24 Q Do you recall Mr. Woodard raising  
25 concerns where the plan is one in which an

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1 C E R T I F I C A T E

2 I, MICHAEL FRIEDMAN, a Certified Court  
3 Reporter and Notary Public, qualified in and for  
4 the State of New Jersey do hereby certify that  
5 prior to the commencement of the examination  
6 MICHAEL BEN-JACOB was duly affirmed by me to  
7 testify to the truth the whole truth and nothing  
8 but the truth.

9 I DO FURTHER CERTIFY that the foregoing  
10 is a true and accurate transcript of the testimony  
11 as taken stenographically by and before me at the  
12 time, place and on the date hereinbefore set forth.

13 I DO FURTHER certify that I am neither a  
14 relative of nor employee nor attorney nor counsel  
15 for any of the parties to this action, and that I  
16 am neither a relative nor employee of such attorney  
17 or counsel, and that I am not financially  
18 interested in the action.

19  
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21

22 MICHAEL FRIEDMAN, CCR of the  
23 State of New Jersey  
24 License No: 30XI00228600  
25 Date: October 13, 2021